

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN CIVIL LIBERTIES UNION,)
et al.,)
Plaintiffs,)
v.) Civil Action No.
ALBERTO R. GONZALES, in his official) 98-CV-5591
capacity as Attorney General of the United)
States,)
Defendant.)

**CONDOMANIA'S RESPONSES AND OBJECTIONS TO DEFENDANT'S FIRST SET
OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Addazi, Inc., d/b/a Condomia ("Plaintiff") responds and objects to Defendant Alberto R. Gonzales's First Set of Interrogatories ("Interrogatories") as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to the Interrogatories to the extent the instructions and demands therein purport to impose obligations in addition to, beyond, or different from those set forth in the Federal Rules of Civil Procedure and the Rules of Civil Procedure of the United States District Court for the Eastern District of Pennsylvania.
2. Plaintiff objects to the Interrogatories to the extent they call for the identification or disclosure of information that is neither relevant to the claims and defenses of any party in this action nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff submits these responses and objections without conceding the relevance or materiality of the subject matter of any interrogatory.

RESPONSE TO INTERROGATORY NO. 11

Plaintiff objects to this Interrogatory because it calls for identification of information not within the possession, custody or control of the Plaintiff. Subject to the foregoing and to the General Objections, Plaintiff states that it has no information responsive to this request.

INTERROGATORY NO. 12

Identify the number or proportion of ACLU members who have provided a credit card number to a website in order to purchase membership, online content, and/or other items for sale, to make a donation, or to make a reservation (such as a rental car or hotel reservation).

RESPONSE TO INTERROGATORY NO. 12

Plaintiff objects to this Interrogatory because it calls for identification of information not within the possession, custody or control of the Plaintiff. Subject to the foregoing and to the General Objections, Plaintiff states that it has no information responsive to this request.

INTERROGATORY NO. 13

For each website plaintiff, identify a representative sample of webpages on your website which contains material about which you fear prosecution under COPA, as referenced in Paragraph 2 in the section titled "The Impact of COPA on Plaintiffs" on page 24 of the Amended Complaint that "[P]laintiffs fear prosecution under COPA for communicating, sending, displaying, or distributing material that might be deemed 'harmful to minors' by some community in the United States."

RESPONSE TO INTERROGATORY NO. 13

Plaintiff objects that this Interrogatory is premature, unreasonably cumulative and duplicative of Document Request No. 1, and calls for identification of information that is in the public domain. Plaintiff also objects that the phrases used to define "representative sample,"

including "distribution of characteristics," "degree of explicitness of sexual content," and "population or universe" are vague and ambiguous. Subject to the foregoing and to the General Objections, Plaintiff refers to the web content identified in the Amended Complaint and responds as follows:

- 1) <http://condomania.com/safersex/> (last viewed October 23, 2005) and the links accessible therein contain links to candid and explicit discussions of and images depicting various aspects of sexual contact and activity, including, but not limited to, sexual intercourse, other kinds of sexual contact and activity, and sexually transmitted diseases;
- 2) <http://condomblogs.com/content/?roadtest> (last viewed October 23, 2005) and the links accessible therein contain, among other things, magazine reviews of Plaintiff's products which contains candid and explicit discussions and depictions of various forms of sexual contact and activity as well as human genitalia;
- 3) <http://www.condomania.com/condoms.asp?dept=4> (last viewed October 23, 2005) and the links accessible therein contain, among other things, candid and explicit discussions and depictions of various forms of sexual contact and activity as well as human genitalia;
- 4) <http://www.condomania.com/gifts.asp?dept=12> (last viewed October 23, 2005) and the links accessible therein contain, among other things, candid and explicit discussion and images of various forms of sexual contact and activity as well as human genitalia;
- 5) <http://www.condomblogs.com/> (last viewed October 27, 2005) and the links accessible therein contain or may contain in the future, among other things, candid and explicit comments or questions on a diverse category of topics posted directly by Internet web users.



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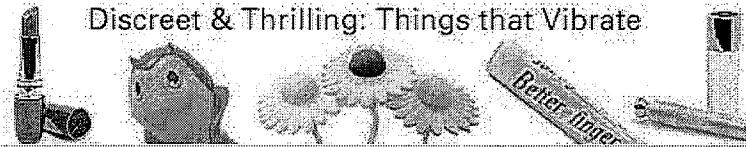
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SAFER SEX

Getting Educated at Condomania

At Condomania, we believe that the best way for the public to make educated choices about safer-sex products is through access to accurate, non-judgmental information. Our focus on education enables customers to feel comfortable asking questions and sharing ideas. We provide training to insure that the employees offer a supportive and friendly sounding board for customers' concerns. [Next >](#)

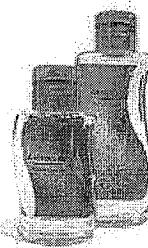
HIV/AIDS Statistics

You are not going to believe these numbers.

Health & Sexuality Links

We wouldn't quite call this our "cool list." Rather, it is [list of sites](#) that are dedicated to promoting safer sex, AIDS awareness, education, and a positive sexuality. And that, we think, is cool!

Astroglide Fights HIV in Lab Test



Reuters reports that Astroglide Personal Lubricant has been found to block the replication of the human immunodeficiency virus in lab tests. The lubricants killed HIV-infected white blood

cells and HIV in seminal fluid, according to researchers from the University of Texas Medical Branch in Galveston.

Dr. Samuel Baron and colleagues conducted the study to examine over-the-counter vaginal preparations for their ability to inhibit HIV production.

While the spermicide nonoxynol-9 has been found in lab tests to fight HIV, it doesn't prevent the virus from spreading, probably because it causes genital irritation, the authors note in the July 20th issue of AIDS Research and Human Retroviruses. For this reason, the researchers only looked at non-irritating lubricants. [Next >](#)

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[Take A Good Look](#)

[Negotiating Safer Sex](#)

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- [The Next Big Thing](#)

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- [Exotic Feather Ticklers](#)
- [Rose Bud Feather Ticklers](#)
- [The Big Bang](#)

- [Topless Academy's Guide to Bartending](#)
- [Bachelorette's Last Fling Shot](#)

- [FLIRT Lover's Doggie Style Strap](#)
- [The Big "O" Rings 4 Pack](#)
- [FLIRT Pink Sex Sling](#)

- [more](#)

- [Pro Recipe Cocktail Shaker](#)

- [more](#)

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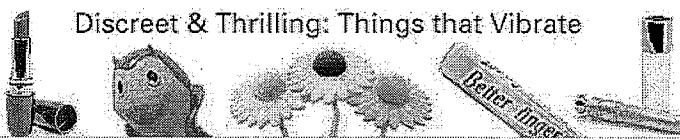
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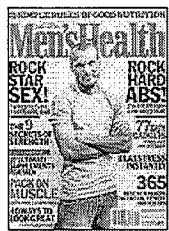
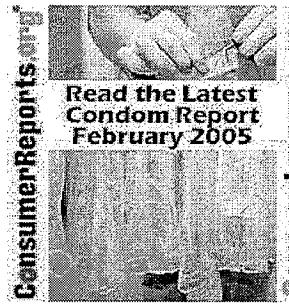
Product Reviews - Road Test



Condoms are put to the test and the reviews are in...

To quote from Men's Confidential, "If testing the feel of condoms isn't wildly subjective, then we don't know what is." Despite the obvious, various

magazines over the years have attempted to use personal experience as a measuring stick to rate one condom against the next. And while we agree that a consensus of experience can effectively sort condoms into the categories of "worth trying" and "don't bother," in the end the true test is going to be yours.



Men's Health 11/2003
by Mike Zimmerman

Condoms Reviewed:

Trojan Her Pleasure
Crown Skinless Skin
Durex Ultimate Feeling
Trojan Pleasure Mesh
Durex Intense Sensation
Trojan Twisted Pleasure
Night Light
Trustex Flavored

[read review](#)



GQ 4/2003
by Peter Rubin

Condoms Reviewed:

Durex Avanti
Inspiril
Pleasure Plus
Xtra Pleasure
Trojan Her Pleasure
Trojan Supra
Trojan Ultra Pleasure
Trustex Flavored
Extended Pleasure

[read review](#)

More Reviews

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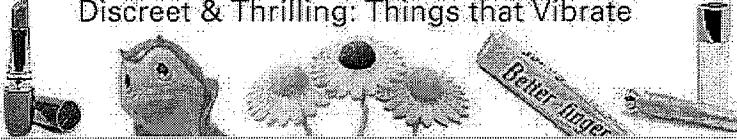
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Discreet & Thrilling: Things that Vibrate



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Condoms

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Type

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Brand

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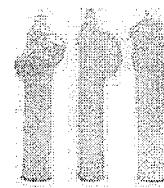
Size

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Hi, I'm the Condom Wizard and resident condom expert around here. If you don't already know, today's condoms can be so pleasurable that using one may be better than not using one at all! If you need any guidance on picking out the best condom for you, I can help. So poke around and have fun!



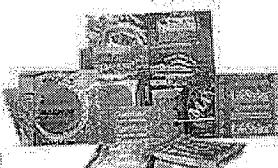
[More Info >](#)



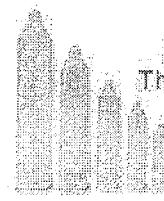
Pleasure
Producing
Wonders

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Condom
Buffet:
Samplers



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Revolutionary!
They-Fit Condoms in
55 Custom-Fit
Sizes

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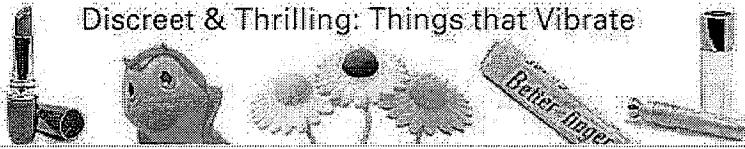
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Gifts & Novelties

[Barware](#)

Darling, step right in and get comfortable. Are you looking for a gift today? Perhaps something to spice up a relationship? Maybe a present for an old friend or a new love interest? Let's look into my crystal ball and I will show you the way.

[Birthday](#)

[Candles](#)

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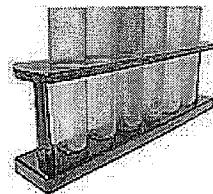
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[Sexy Yummies](#)

[Sinful Chocolates](#)



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For the Well-
Stocked Bar
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Lil' Kinky:
Candy Necklace
Goes Naughty

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Sexy Sweets:
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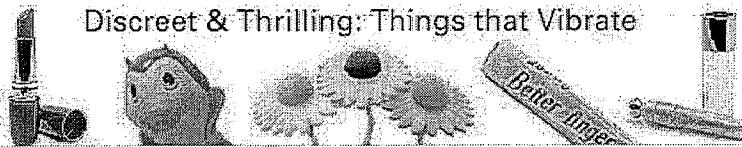
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Condoms, Sex, & Desire

National HIV Testing Day

June 27th is National HIV Testing Day. Check out hivtest.org for resources on HIV testing including a national database of HIV testing sites and answers to many questions about HIV/AIDS and testing. Stop putting it off and get tested today!

[LinkLust] Posted by Kev at 10:10 AM | Comments (0)

N-9 In TheyFit

Your product is great. The only thing I am wondering is will you ever include Nonoxyanol-9 in your just my size custom fit condoms to help prevent pregnancy. My wife's concern. Thank you.

B at Wondering

Continue reading "N-9 In TheyFit"

[Q&A] Posted by filchyboy at 09:08 AM | Comments (0)

Serious Props

Wow! One of our customers is apparently very happy with our TheyFit condoms. Check it out!

[LinkLust] Posted by filchyboy at 08:44 AM | Comments (0)

Parents Just Don't Understand?

A recent ABC news feature & a separate study in the UK interviewed teens & their parents about sex, perspectives on the topic -- especially in regard to what sexual activity at what age kids are participating in them -- were wildly different.

Parents can find out more about teens & sex at the following Web sites: TeenPregnancy.org; sexetc.org; gurl.com; TalkingWithKids.org

[LinkLust] Posted by fergie at 08:34 PM | Comments (0)

Naming the Wicked

Meanwhile, arguing to withhold help from people ravaged by disease because someone somewhere might have sex using a condom — now that's "wicked."



Trojan Magnum

Twister

Twist and Shout!

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Safer Sex Manual

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Kathleen Parker makes some important points about the Catholic church's evolving stance on condoms and its effect on American national politics.

[LinkLust] Posted by filchyboy at 08:44 AM | Comments (0)

New Look

Well it's been a long while but the blog is finally starting to look like our new site. As some of our more regular readers might have noticed Condomania switched to a new platform for our store back in the fall and up until last night we still had our old look and feel applied to our blog. Well that has now changed. Hopefully this transition will be finished soon. But for now please bear with me as we wrench ourselves into the present with a new look and feel.

[Biz] Posted by filchyboy at 08:10 PM | Comments (0)

U.S. HIV Rates on the Rise

The number of **HIV diagnoses for U.S. men who have sex with men increased by 8 percent last year**, which also marked the highest number of HIV/AIDS cases in the States since the 1980s. The Center for Disease Control estimates 1,039,000 to 1,185,000 Americans were living with HIV in December 2003, an increase of almost 25 percent since their last report in 2002.

[LinkLust] Posted by fergie at 01:08 PM | Comments (0)

Oral HIV testmaker addresses false results

In December 2005, a number of specific sites in San Francisco and New York City, and the L.A. Gay and Lesbian Center reported levels of false positive results while using OraQuick® ADVANCE™ with oral fluid that were higher than expected based on the previously established performance for the product. Immediately after receiving these reports, OraSure Technologies initiated a scientific and systematic evaluation of each situation and has been working in collaboration with affected customers, health care officials and government agencies including the Centers for Disease Control and Prevention (CDC) and the U.S. Food and Drug Administration (FDA) to determine the cause or causes for these unexpected results.

(source: orasure.com)

"When the test was approved in 2004, it had a 98.6 percent specificity, which means you could expect about two false positives out of a thousand results," said Richard Klein, a HIV/AIDS program director in the FDA. "Now the results from Los Angeles and San Francisco are showing approximately nine false positives out of a thousand, which the FDA still considers good specificity."

[Biz] Posted by fergie at 11:39 AM | Comments (0)

Internet Sexuality Information Services

Los Angeles County health officials unveiled a controversial tool last week to fight the spread of HIV and other diseases: a Web site lets people anonymously tell sex partners they may be infected.

The site, inSPOTLA.org, is co-sponsored by the San Francisco AIDS Foundation

[LinkLust] Posted by fergie at 04:12 PM | Comments (0)

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On the Radio

Adam will be interviewed on the Derek & Romaine Show on Sirius Radio today. Listen in and let us know what you thought!

[Biz] Posted by filchyboy at 08:12 AM | Comments (0)

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